

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**DARRIN VANPELT,**

Plaintiff,

-vs-

CASE NO. 2:21-cv-10352  
HON. ROBERT H. CLELAND

**AARON LAYNE, and  
CITY OF DETROIT**

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) AMY J. DEROUIN (P70514) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650 / (248) 698-3321-fax <a href="mailto:amy.derouin@cjtrainor.com">amy.derouin@cjtrainor.com</a>	CITY OF DETROIT LAW DEPT. GREGORY B. PADDISON (P75963) Attorney for Defendants 2 Woodward Avenue, Ste. 500 Detroit, MI 48226 313-237-0435 / 313-224-5505-fax <a href="mailto:paddisong@detroitmi.gov">paddisong@detroitmi.gov</a>
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**PLAINTIFF'S EXPERT DISCLOSURES**

NOW COMES Plaintiff, **DARRIN VANPELT**, by and through his attorneys, **CHRISTOPHER TRAINOR & ASSOCIATES**, and for his *Expert Disclosures* pursuant to the Court's Scheduling Order, respectfully states the following:

1. Plaintiff reserves the right to rely on any of his treating physicians to provide expert opinions as to proximate cause of his injuries and damages that he sustained as a result of the subject incident. It is anticipated that these medical providers will testify consistently with their medical records in which Plaintiff has already provided signed Releases to Defendants' counsel in order for Defendants to receive said records on their own time and expense. Even though these providers are treating physicians and are qualified to offer testimony as to proximate cause, among other areas, related to Plaintiff's injuries, Plaintiff will provide a brief summary of their expected testimony as referenced below:

- a. Detroit Fire/EMS  
Detroit Public Safety Headquarters  
1301 3<sup>rd</sup> Street  
Detroit, MI 48226
  - i. Michaela Ryan, EMT
  - ii. Madison Stitt, EMT

As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left hip injury including, but not limited to, the following: left hip acetabular fracture; dislocation of left hip; mobility and range of motion issues; weight bearing issues and pain; and (b) medical treatment rendered related to these injuries.

- b. DMC Sinai Grace Hospital  
6071 Outer Drive West  
Detroit, MI 48235
  - i. Sam Ovidia, D.O., Orthopedic Surgeon (Closed Reduction)
  - ii. Frederick E. Tonnos, D.O., Orthopedic Surgeon (ORIF)
  - iii. Devone T. Mansour, D.O., Orthopedic Surgeon (ORIF)
  - iv. Dr. Ehrman
  - v. Jason B. Kurle, D.O.
  - vi. Steven R. Miller, M.D.
  - vii. Daniel B. Hoard, M.D.
  - viii. Thomas Pigniazek, PA-C
  - ix. Madison Harrison, RN
  - x. Pauline Lee, CRNA
  - xi. Tony Schmittling, CRNA
  - xii. Thomas A. Pieniazek, PA
  - xiii. Rebba Hawkins, RN

- xiv. Stephanie Curtiss, RN/CM
- xv. Eleanor Kotov, M.D.-Resident
- xvi. John Kim, M.D.
- xvii. Petr Lipus
- xviii. Houssain Alderawy
- xix. Nathaniel Hunt
- xx. Shelli L. Coleman, RN
- xxi. Kerellos A. Nasr, M.D.
- xxii. Susan J. Seman, D.O.
- xxiii. Alexander Nowc, RN
- xxiv. Tolulope O. Sonuyi, M.D.
- xxv. Chantelle Collins M.D.-Resident
- xxvi. Andrew Hollenbeck, M.D.
- xxvii. Fazaldin Moghul D.O.-Resident
- xxviii. Jessica L. Willis
- xxix. Angela D. Greene
- xxx. Debbie Magee
- xxxi. Andrea D. McLin, RN
- xxxii. Danita M. Terry, RN
- xxxiii. Jamie R. Reed
- xxxiv. Seon H. Park, RN
- xxxv. Raina E. Cesarz, RN
- xxxvi. Sanjib Roy Chowdhury, PT
- xxxvii. Anthony M. Raymond, RN
- xxxviii. Lakeisha M. Pearson
- xxxix. Lisa D. Poe
- xl. John St. Laurent
- xli. Trinell Stevenson
- xlii. Pamela D. Williams
- xliii. Jamie R. Reed
- xliv. Samantha Amber Muczinski, RN
- xlv. Vickie Dancy
- xlvi. Crystal Powe, OT
- xlvii. Anthony Raymond, RN
- xlviii. Li Z. Zheng, PharmD
- xlix. Alana T. Michael, ARRT
- l. Colleen Coleman, ARRT
- li. Jacqueline T. Huynh, M.D.
- lii. Nicole M. Smith, ARRT
- liii. Cynthia A. Fleming, ARRT

- liv. Linda Fakih, RPh
- lv. Sarah E. Pack-Dyer, PharmD
- lvi. Ashley Powell, PharmD
- lvii. Stella Mahn, RPh
- lviii. Michelle R. Hudson
- lix. Ramez D. Abdel-Rattah RN
- lx. Amie Maday
- lxi. Mark I. Burnstein, M.D.
- lxii. Brianna Walters
- lxiii. Maysoon M. Al-Hihi M.D.
- lxiv. Thomas Russo D.O.-Resident
- lxv. Rebecca Fischer M.D.-Resident
- lxvi. Carleta J. Poydras PA-C
- lxvii. Sasha Stine, M.D.-Resident
- lxviii. Shatika M. Gaines
- lxix. Petra J. Gheraibeh, M.D.
- lxx. Gail D. Robinson
- lxxi. Judith A. Shirey
- lxxii. Stephanie L. Beachnau, RPh
- lxxiii. Brinda Krish, D.O.-Resident
- lxxiv. Adam Urban, PA-C
- lxxv. Kyle R. Carlson D.O.-Resident
- lxxvi. Stephanie M. Taylor, RN
- lxxvii. Doaa Alessi
- lxxviii. Kayliegh Orellanes, ARRT
- lxxix. Jillian Jansen, M.D.-Resident
- lxxx. Stacy Otremba, PharmD
- lxxxi. Nikia Brockington, ARRT
- lxxxii. Lindsay Nelson, D.O.-Resident
- lxxxiii. Yan Cao, M.D.-Resident
- lxxxiv. Maera Haider, M.D.-Resident
- lxxxv. Muriel Justman
- lxxxvi. Tina Baker, RN
- lxxxvii. Latonya Fields
- lxxxviii. Kelly Howard

As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left hip injury including, but not limited to, the following: a severely comminuted displaced

left acetabular fracture; dislocation of left hip; hematoma; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; pain and radiating pain; tenderness; numbness; and tingling; (b) left leg injury including, but not limited to, the following: nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; paresthesia; pain and radiating pain; numbness; and tingling; (c) left foot injury including, but not limited to, the following: drop foot; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; pain; impaired sensations - hypoesthesia; numbness; and tingling; weakness; edema; and post-surgical changes; (d) left knee injury including, but not limited to, the following: pain; range of motion issues; numbness; radiating pain; issues with weight bearing; (e) left ankle injury including, but not limited to, the following: functional deficits; range of motion and mobility issues; pain; radiation of pain; tingling; numbness; weakness; (f) penile injury including, but not limited to, the following: urination issues; pain; and bleeding; (g) the injuries' effect on Plaintiff's daily activities and lifestyle and (h) medical treatment rendered related to these injuries including, but not limited to, the closed reduction surgery of Plaintiff's left hip with the placement of a skeletal traction performed by Dr. Sam Ovidia on March 24, 2019 and the open reduction internal fixation surgery of Plaintiff's left posterior wall and posterior column acetabular fracture formed by Dr. Frederick Tonnos and Dr. Devona Mansour on March 27, 2019.

- c. Beaumont Hospital  
28050 Grand River  
Farmington Hills, MI 48336
  - i. Bridget Cholewa, DO
  - ii. David Hess, DO

As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left hip injury including, but not limited to, the following: a severely comminuted displaced left acetabular fracture; dislocation of left hip; hematoma; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; edema; weakness; pain and radiating pain; tenderness; numbness; and tingling; (b) left leg injury including, but not limited to, the following: nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; paresthesia; pain and radiating pain;

numbness; and tingling; (c) left foot injury including, but not limited to, the following: drop foot; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; pain; impaired sensations - hypoesthesia; numbness; and tingling; weakness; edema; and post-surgical changes; (d) left knee injury including, but not limited to, the following: pain; range of motion issues; numbness; radiating pain; issues with weight bearing; (e) left ankle injury including, but not limited to, the following: functional deficits; range of motion and mobility issues; pain; radiation of pain; tingling; numbness; weakness; (f) the injuries' effect on Plaintiff's daily activities and lifestyle and (g) medical treatment rendered related to these injuries.

d. DMC Orthopaedics & Sport Medicine Heart Hospital

311 Mack Avenue, 5th Floor

Detroit, MI 48201

i. Robert E. Meehan, M.D.

ii. Muhammad Padela, M.D

As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left hip injury including, but not limited to, the following: a severely comminuted displaced left acetabular fracture; dislocation of left hip; hematoma; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; edema; weakness; pain and radiating pain; tenderness; numbness; and tingling; (b) left leg injury including, but not limited to, the following: nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; paresthesia; pain and radiating pain; numbness; and tingling; (c) left foot injury including, but not limited to, the following: drop foot; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; pain; impaired sensations - hypoesthesia; numbness; and tingling; weakness; edema; and post-surgical changes; (d) left knee injury including, but not limited to, the following: pain; range of motion issues; numbness; radiating pain; issues with weight bearing; (e) left ankle injury including, but not limited to, the following: functional deficits; range of motion and mobility issues; pain; radiation of pain; tingling; numbness; weakness; (f) the injuries' effect on Plaintiff's daily activities and lifestyle; (g) medical treatment rendered related to these injuries; and (h) future medical treatment including, but not limited to, a surgery in order to fuse Plaintiff's left big toe as it is likely that function will never return to the muscle in his left leg.



- e. Joint Plus Excel Orthopedic Center  
6072 Outer Drive West  
Detroit, MI 48235
  - i. Frederick E. Tonnos, DO
  - ii. Adam Urban, PA-C
  - iii. Devone T. Mansour, DO

As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left hip injury including, but not limited to, the following: a severely comminuted displaced left acetabular fracture; dislocation of left hip; hematoma; nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; pain and radiating pain; tenderness; numbness; and tingling; (b) left leg injury including, but not limited to, the following: nerve damage; mobility and range of motion issues; weight bearing issues and gait abnormality; weakness; paresthesia; pain and radiating pain; numbness; and tingling; (c) left foot injury including, but not limited to, the following: drop foot; nerve damage; paresthesias; mobility and range of motion issues; weight bearing issues and gait abnormality; pain; impaired sensations - hypoesthesia; numbness; and tingling; weakness; edema; and post-surgical changes; (d) left knee injury including, but not limited to, the following: pain; range of motion issues; numbness; radiating pain; issues with weight bearing; (e) left ankle injury including, but not limited to, the following: functional deficits; range of motion and mobility issues; pain; radiation of pain; tingling; numbness; weakness; (f) penile injury including, but not limited to, the following: urination issues; pain; and bleeding; (g) the injuries' effect on Plaintiff's daily activities and lifestyle and (h) medical treatment rendered related to these injuries including, but not limited to, the open reduction internal fixation surgery of Plaintiff's left posterior wall and posterior column acetabular fracture formed by Dr. Frederick Tonnos and Dr. Devona Mansour on March 27, 2019 and prescription for Plaintiff's left ankle brace.

- f. Befitting You Medical Supply  
6071 W. Outer Drive Ste. M106  
Detroit, MI 48235
  - i. Kyle Carlson, DO



As referenced above, these witnesses will offer testimony as to proximate cause as well as their treatment plan, diagnosis, and prognosis of Plaintiff's injuries including, but not limited to, the following: (a) left foot injury including, but not limited to, the following: drop foot; mobility and range of motion issues; impaired sensations – hypoesthesia; gait abnormality; pain; numbness; burning; and tingling; weakness; edema; post-surgical changes; and left great toe pain; (b) the injuries' effect on Plaintiff's daily activities and lifestyle; and (c) medical treatment rendered related to these injuries including, but not limited to, the prescription for a Nova 5630BK Quad Cane Small Base Black and an ankle brace.

2. Experts in the specialty of Psychiatry, Neurology, and Neuropsychology:

- a. Gerald A. Shiener, M.D.  
251 Merrill  
Birmingham, MI 49009

Dr. Shiener has been retained and it is expected that he will testify as to the subject incident's effect on Plaintiff's psychological injuries. The attached documents pursuant to FRCP 26(a)(2) will be produced under a separate cover.<sup>1</sup>

3. Experts in the Specialty of Radiology and Neuroradiology:

- a. Adeel Khalid, M.D.  
5690 Forman Dr.  
Bloomfield Hills, MI 48301

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Dr. Khalid will testify to the subject incident causing Plaintiff to sustain an injury or injuries including, but not limited to, his left hip, left leg, left foot, and left knee. The Curriculum Vitae of Dr. Khalid for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

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<sup>1</sup> Due to unforeseen technical issues with Plaintiff's Counsel's office server that has resulted in the temporary inability to access documents within the electronic server storage, Plaintiff must provide all documents that would be normally be attached to his expert disclosures under a separate cover.

4. Experts in the area of Orthopedics:

- a. Dr. Martin B. Kornblum, M.D.  
11900 East 12 Mile Rd., Ste. 110  
Warren, MI 48093

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Dr. Kornblum will testify to the subject incident causing Plaintiff to sustain an injury or injuries including, but not limited to, his left hip, left leg, left foot, and left knee. The Curriculum Vitae of Dr. Kornblum for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

- b. Stephen Mendelsen, MD  
11900 East 12 Mile Rd., Suite 110  
Warren, MI 48093

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Dr. Mendelsen will testify to the subject incident causing Plaintiff to sustain an injury or injuries including, but not limited to, his left hip, left leg, left foot, and left knee. The attached Curriculum Vitae of Dr. Mendelsen for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

- c. Ronald Lederman, MD.  
2300 Haggerty Road, Ste. 1110  
West Bloomfield, Michigan 48323

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Dr. Lederman will testify to the subject incident causing Plaintiff to sustain an injury or injuries including, but not limited to, his left hip, left leg, left foot, and left knee. Dr. Lederman's Curriculum Vitae for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

5. Expert in the area of Vocational Rehabilitation:

- a. Fuller Rehabilitation, LLC  
James Fuller, C.R.C., N.C.C.  
P.O. Box 20724  
Ferndale, MI 48220

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that this expert will testify to vocational and rehabilitation issues/deficits regarding the injuries Plaintiff sustained as a result of the subject incident. James Fuller's Curriculum Vitae for qualifications of this witness will be provided under a separate cover.<sup>1</sup>

6. Expert in the field of Use of Force, Police/Jail policy and procedures, Municipal Policy/Customs/Practices/Procedures and Misconduct/Crime Scene investigation:

- a. W. Ken Katsaris  
110-A South Monroe Street  
Tallahassee, FL 32301  
850-224-2929

Mr. Katsaris has been retained and he will author and provide a report upon the completion of additional discovery. It is anticipated that Mr. Katsaris will testify that the force used against Plaintiff violated his constitutional law rights as well as Plaintiff's rights being violated as a result of Defendant City of Detroit's failure to adequately train and supervise its correction officers and/or police officers. In addition, this witness will further testify to the police investigative procedures and police procedures regarding obtaining evidence. The Curriculum Vitae of Ken Katsaris for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

7. Experts in the specialty of audio and video forensics.

a. Primeau Forensics, LTD

Edward John Primeau, CCI, CFC  
1878 Star Batt Drive, Bldg. 2E  
Rochester Hills, MI 48309

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Mr. Primeau will testify to the existence and authenticity of the audio and/or video recordings capturing the subject incident. It is further expected that Mr. Primeau will testify whether any recordings or parts of recordings existed related to the subject incident and the manner of their destruction. The Curriculum Vitae of Edward Primeau for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>


b. Evan Milefchik

Information Technology Expert  
Envision Information Technologies  
302 Legato Drive  
Walled Lake, MI 48390

No such report has been prepared to date as Plaintiff has not yet retained this expert as of the date of this writing. It is anticipated that Mr. Milefchik will testify to the existence and authenticity of the audio and/or video recordings capturing the subject incident. It is further expected that Mr. Milefchik will testify whether any recordings or parts of recordings existed related to the subject incident and the manner of their destruction. The Curriculum Vitae of Evan Milefchik for the qualifications of this witness will be provided under a separate cover.<sup>1</sup>

8. Plaintiff reserves the right to amend his expert disclosures as may become necessary through the course of discovery.

Respectfully Submitted,  
CHRISTOPHER TRAINOR & ASSOCIATES

  
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CHRISTOPHER J. TRAINOR (P42449)  
AMY J. DEROUIN (P70514)  
THOMAS P. KERR (P84864)  
Attorneys for Plaintiff  
9750 Highland Road  
White Lake, MI 48386  
(248) 886-8650

Dated: August 26, 2021  
*AJD/tpk*

**PROOF OF SERVICE**

The undersigned certified that on the 26<sup>th</sup> day of August, 2021 a copy of the foregoing document was served upon the attorney(s) of record by e-mailing a copy of same to said attorney(s) at their stated business e-mail address. I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge, and belief.

  
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SHANNA SUVER